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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

PLANNED PARENTHOOD OF GREATER
WASHINGTON AND NORTH IDAHO;
PLANNED PARENTHOOD OF THE
GREAT NORTHWEST AND THE
HAWAIIAN ISLANDS; and PLANNED
PARENTHOOD OF THE HEARTLAND,

Plaintiffs,

v.

U.S. DEPARTMENT OF HEALTH AND
HUMAN SERVICES and ALEX MICHAEL
AZAR II in his official capacity
as Secretary of the U.S.
Department of Health and Human
Services,

Defendants.

NO. 2:18-cv-00055

DECLARATION OF
DR. MELINDA GIOVENGO ON
BEHALF OF YOUTHCARE IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTIVE RELIEF

DECLARATION OF DR. MELINDA GIOVENGO
ON BEHALF OF YOUTHCARE

I, Dr. Melinda Giovengo, on behalf of YouthCare, hereby declare the
following under penalty of perjury:

1. I am the Chief Executive Officer & President of YouthCare.

YouthCare is a not-for-profit corporation organized under the laws of Washington.

YouthCare serves homeless youth ages 12 to 24 in the Greater Seattle Area.

YouthCare provides outreach, basic services, emergency shelter, housing,
counseling, education, and employment training.

2. This declaration is based upon my personal knowledge, my review of
YouthCare's business records, and the knowledge I have acquired in the course of
my duties with YouthCare. If called and sworn as a witness, I could and would
testify competently thereto.

3. A majority of individuals served by YouthCare are youth of color

1 and/or identify as LGBTQ; and they are disproportionately impacted by sexual
2 violence, trauma, and exploitation. Prior to encountering YouthCare, many have
3 received little, or no, sexual education.

4 4. YouthCare partnered with Planned Parenthood of the Great Northwest
5 and the Hawaiian Islands (PPGNHI) to deliver to youth and staff a Teen Pregnancy
6 Prevention Program (TPPP) called Stronger Together.

7 5. The TPPP is an evidence-based sexual health program that teaches
8 youth about their sexuality, anatomy and physiology, contraception, and sexually
9 transmitted infections. The TPPP training approaches the subject matter through a
10 positive lens, and creates a safe and judgment-free space for youth to learn without
11 shame.

12 6. Through Stronger Together, YouthCare and PPGNHI were able to
13 provide YouthCare staff with comprehensive training, and were working to build a
14 customized curriculum tailored to the unique needs of minors experiencing
15 homelessness.

16 7. Planned Parenthood has been a diligent partner in customizing a
17 curriculum that is inclusive to all of the youth we serve, with a focus on three key
18 areas: increasing condom usage, increasing communication and agency in sexual
19 encounters, and decreasing alcohol use. This shared work has been critical to
20 prioritizing sexual education at YouthCare and giving young people the space and
21 support to explore their bodies and values.

22 8. Based on the success of its initial sessions, YouthCare, through its
23 partnership with Planned Parenthood, planned to continue regularly scheduled
24 sessions of the Stronger Together program.

25 9. If YouthCare loses the benefit of this partnership, the program will
26 terminate.

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Dated: March 13, 2018

By: /s/ Dr. Melinda Giovengo
Melinda Giovengo, PhD
CEO & President, YouthCare